

JUDGE SCHEINDLINUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- :

INFORMATIONTEMEKA RACHELLE LEWIS,
a/k/a "Rachelle," :

08 Cr. ____

Defendant. :

08 CRIM 433

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COUNT ONE

The United States Attorney charges:

1. From in or about November 2005, through and including on or about March 6, 2008, in the Southern District of New York and elsewhere, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1952(a)(3), 2421, and 2422(a) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, and others known and unknown, would and did use and cause to be used facilities in interstate commerce, to wit, cellular telephones and e-mail, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit, a business enterprise involving prostitution offenses in violation of applicable State law, and thereafter did perform and attempt to

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perform an act to promote, manage, establish, and carry on and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

3. It was further a part and an object of the conspiracy that TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, and others known and unknown, unlawfully, willfully and knowingly would and did transport individuals in interstate and foreign commerce with intent that such individuals engage in prostitution, and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

4. It was further a part and an object of the conspiracy that TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, and others known and unknown, unlawfully, willfully and knowingly would and did persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others,

were committed in the Southern District of New York and elsewhere:

a. On or about January 15, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with a man over the telephone about arranging for a prostitute to go to the man's room at a hotel in New York, New York;

b. On or about January 24, 2008, a co-conspirator not named as a defendant herein sent an e-mail to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, attaching a list of the aliases used by more than 50 prostitutes working in, among other places, New York, New York; Los Angeles, California; Miami, Florida; London, England; and Paris, France; and

c. On or about January 28, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with a man over the telephone about arranging for a prostitute to travel from New York to Washington, D.C., to meet the man in his hotel room.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

6. From in or about November 2005, through and including on or about March 6, 2008, in the Southern District of New York and elsewhere, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, and others known and unknown, unlawfully,

willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1956.

7. It was a part and an object of the conspiracy that TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the use of facilities in interstate commerce with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, a business involving prostitution offenses in violation of applicable State law, in violation of Title 18, United States Code, Section 1952(a)(3); interstate transportation of individuals to engage in prostitution, in violation of Title 18, United States Code, Section 2421; and persuasion of individuals to travel in interstate and foreign commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a), (a) with the intent to promote the carrying on of specified unlawful

activity, and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about January 22, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with a man over the telephone about paying for prostitution by directing a wire transfer to "QAT Consulting" in New York so it would show up "like as a business transaction"; and

b. On or about January 27, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with a man over the telephone who asked LEWIS whether the QAT Consulting company could be traced because he was concerned about being "busted."

(Title 18, United States Code, Sections 1956(h).)

FORFEITURE ALLEGATION

9. As a result of committing the money laundering offense alleged in Count Two of this Information, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense alleged in this Information and all property traceable to such property, including but not limited to the following:

a. approximately \$2,989.08 seized from HSBC bank account [REDACTED] on or about March 6, 2008;

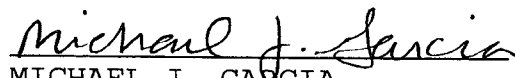
b. approximately \$1 million in United States currency seized on or about March 6, 2008, from [REDACTED]
[REDACTED] Cliffside Park, New Jersey 07010;

b. approximately \$86,409.75 seized on or about March 6, 2008, from North Fork Bank account [REDACTED], in the name of "QAT Consulting Group, Inc.";

c. approximately \$93,320.24 seized on or about March 6, 2008, from HSBC account [REDACTED] in the name of "QAT International, Inc."; and

d. a Honda Odyssey bearing Vehicle
Identification Number [REDACTED] registered to "QAT
Consulting Group, Inc., [REDACTED] New York, New York
10004."

(Title 18, United States Code, Section 982.)


MICHAEL J. GARCIA
United States Attorney

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- v. -

TEMEKA RACHELLE LEWIS,

Defendant.

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(18 U.S.C. §§ 371 and 1956(h).)

MICHAEL J. GARCIA
United States Attorney.
